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1 transmitter, responsive to the server, to transmit content over a *second network* to
2 the local service provider.”

3 Payton does not show or disclose a server to serve content to a local service
4 provider via a first network, and a transmitter responsive to the server to transmit
5 content over a second network to the local service provider, as recited in claim 51.

6 The Office suggests that Payton describes a second network (30) to transmit
7 information from server (24) to local server (28) (*see* Payton Fig. 2) (*Office Action*
8 p.2). To the contrary, Payton describes a back channel (30) between local server
9 (28) and distribution server (24) (col. 6, lines 51-55). The back channel is not
10 described as a network to serve content from a server to a local service provider as
11 recited in claim 51.

12 Payton does not show or disclose two networks to serve content from a
13 server to a local service provider as recited in claim 51. Accordingly, claim 51 is
14 allowable over Payton and Applicant respectfully requests that the §102 rejection
15 be withdrawn.

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17 Claims 52-55 are allowable by virtue of their dependency upon claim 51.
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Respectfully Submitted,

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